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Mailed Nov. 11, 2013

AT&T Services, Inc.
2600 Camino Ramon, Rm 3E450Z
San Ramon, CA 94583

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November 11, 2013

East Tennessee Permit Program
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L Parks Avenue, 15th Floor
Nashville, TN 37243

Cookeville Environmental Field Office
Division of Air Pollution Control
1221 South Willow Avenue
Cookeville, TN 38506

Re: Startup Certification for 967419P and Operating Permit Application
230 H A Dillon Lane, McMinnville, Tennessee
(Emission Source 89-0177-01)

Dear Sir or Madam:

On behalf of New Cingular Wireless PCS, LLC dba AT&T Mobility (referred to herein as "AT&T"), we are submitting the enclosed application for operation of one (1) Generac Model SD050 diesel-fired emergency generator with an engine rated at 70 kilowatts located 230 H A Dillon Lane, McMinnville, Tennessee. The permit application forms can be found in Attachment A.

AT&T received Permit to Construct 967419P issued by the Tennessee Department of Environment and Conservation (TDEC) authorizing the installation of the generator. Pursuant to Condition 26 of the permit, this letter serves as notification of a start-up date of October 30, 2013 and is being submitted within 30 days of startup. Additionally, a complete copy of the construction permit with the startup certification is included in Attachment B.

AT&T is submitting the attached TDEC Forms APC-100, APC-101, and APC-102 to obtain an operating permit for the emergency generator in accordance with Condition 25. Additionally, AT&T is requesting the following changes be made to the Permit to Construct 967419P.

- Please add the following language to Condition 5, in accordance with 60.4211(f)(3)(i)(E):
"The owner or operator identifies and records the entity that dispatches the engine and specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator."
- Please correct the CO hourly emission limit in Condition 16 to be rounded to 0.77 lb/hr.

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- Please correct the NO_x hourly emission limit in Condition 17 to be rounded to 0.73 lb/hr.

AT&T appreciates TDEC's review of this application. If you have any questions, or need further information, please do not hesitate to contact me at (925) 327-2532.

Sincerely,

AT&T SERVICES, INC.



Barbara Walden
Manager, Environment, Health & Safety

Attachments

ATTACHMENT A

APPLICATION FORMS

State of Tennessee
 Department of Environment and Conservation
 Division of Air Pollution Control
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, TN 37243
 Telephone: (615) 532-0554



APC 100

NON-TITLE V PERMIT APPLICATION FACILITY IDENTIFICATION

Please type or print and submit in duplicate for each emission source. Attach appropriate source description forms.				
SITE INFORMATION				
1. Organization's legal name New Cingular Wireless PCS, LLC dba AT&T Mobility		For APC use only	APC Company point no.	
2. Site name (if different from legal name)			APC Log/Permit no.	
3. Site address (St./Rd./Hwy.) 230 H A Dillon Lane		County name Warren		
City or distance to nearest town McMinnville		Zip code 37110	4. NAICS or SIC code 517210	
5. Site location (in lat. /long.)	Latitude 35°39'41.25"		Longitude -85°47'01.37"	
CONTACT INFORMATION (RESPONSIBLE PERSON)				
6. Responsible person/Authorized contact Michele M. Blazek, Assistant Secretary			Phone number with area code (925) 327-2532	
Mailing address (St./Rd./Hwy.) 2600 Camino Ramon, Room 3E450Z			Fax number with area code (281) 664-4201	
City San Ramon	State CA	Zip code 94583	Email address bw2989@att.com	
CONTACT INFORMATION (TECHNICAL)				
7. Principal technical contact Barbara Walden, EH&S Manager			Phone number with area code (925) 327-2532	
Mailing address (St./Rd./Hwy.) 2600 Camino Ramon, Room 3E450Z			Fax number with area code (281) 664-4201	
City San Ramon	State CA	Zip code 94583	Email address bw2989@att.com	
CONTACT INFORMATION (BILLING)				
8. Billing contact Barbara Walden, EH&S Manager			Phone number with area code (925) 327-2532	
Mailing address (St./Rd./Hwy.) 2600 Camino Ramon, Room 3E450Z			Fax number with area code (281) 664-4201	
City San Ramon	State CA	Zip code 94583	Email address bw2989@att.com	
EMISSION SOURCE INFORMATION				
9. Emission source no. (number which uniquely identifies this source) GEN 1				
10. Brief description of emission source 50 kW diesel-fired emergency generator (design rating) equipped with an engine rated at 70 kW (93 hp).				
11. Normal operation: 500 hours/year	Hours/Day N/A	Days/Week N/A	Weeks/Year N/A	Days/Year N/A
12. Percent annual throughput	Dec. – Feb. N/A	March – May N/A	June – August N/A	Sept. – Nov. N/A

(Over)

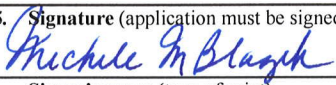
TYPE OF PERMIT REQUESTED				
13. Operating permit (X)	Date construction started September 17, 2013	Date completed October 30, 2013	Last permit no. 967419P	Emission source reference number 89-0177-01
Construction permit ()	Last permit no.		Emission source reference number	
If you choose Construction permit, then choose either New Construction, Modification, or Location transfer				
	New Construction ()	Starting date	Completion date	
	Modification ()	Date modification started or will start	Date completed or will complete	
	Location transfer ()	Transfer date	Address of last location	
14. Describe changes that have been made to this equipment or operation since the last construction or operating permit application: N/A				
SIGNATURE				
Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application and any attached application(s) is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.				
15. Signature (application must be signed before it will be processed)		Date		
		11/8/2013		
Signer's name (type of print) Michele M. Blazek		Title Assistant Secretary	Phone number with area code 925-327-2532	

Table of Pollution Reduction Device or Method Codes

Note: For cyclones, settling chambers, wet scrubbers, and electrostatic precipitators; the efficiency ranges correspond to the following percentages:

High: 95-99+% Medium: 80-95% And Low: Less than 80%.

If the system has several pieces of connected control equipment, indicate the sequence. For example: 008'010.97%

If none of the below codes fit, use 999 as a code for other and specify in the comments.

No Equipment.....	000	Limestone Injection – Dry.....	041
Activated Carbon Adsorption.....	048	Limestone Injection – Wet.....	042
Afterburner – Direct Flame.....	021	Liquid Filtration System.....	049
Afterburner – Direct Flame with Heat Exchanger.....	022	Mist Eliminator – High Velocity.....	014
Afterburner – Catalytic.....	019	Mist Eliminator – Low Velocity.....	015
Afterburner – Catalytic with Heat Exchanger.....	020	Process Change.....	046
Alkalized Alumina.....	040	Process Enclosed.....	054
Catalytic Oxidation – Flue Gas Desulfurization.....	039	Process Gas Recovery.....	060
Cyclone – High Efficiency.....	007	Settling Chamber – High Efficiency.....	004
Cyclone – Medium Efficiency.....	008	Settling Chamber – Medium Efficiency.....	005
Cyclone – Low Efficiency.....	009	Settling Chamber – Low Efficiency.....	006
Dust Suppression by Chemical Stabilizers or Wetting Agents.....	062	Spray Tower (Gaseous Control Only).....	052
Electrostatic Precipitator – High Efficiency.....	010	Sulfuric Acid Plant – Contact Process.....	043
Electrostatic Precipitator – Medium Efficiency.....	011	Sulfuric Acid Plant – Double Contact Process.....	044
Electrostatic Precipitator – Low Efficiency.....	012	Sulfur Plant.....	045
Fabric Filter – High Temperature.....	016	Vapor Recovery System (Including Condensers, Hooding and Other Enclosures).....	047
Fabric Filter – Medium Temperature.....	017	Venturi Scrubber (Gaseous Control Only).....	053
Fabric Filter – Low Temperature.....	018	Wet Scrubber – High Efficiency.....	001
Fabric Filter – Metal Screens (Cotton Gins).....	059	Wet Scrubber – Medium Efficiency.....	002
Flaring.....	023	Wet Scrubber – Low Efficiency.....	003
Gas Adsorption Column – Packed.....	050	Wet Suppression by Water Sprays.....	061
Gas Adsorption Column – Tray Type.....	051		
Gas Scrubber (General: Not Classified).....	013		

Table of Emission Estimation Method Codes

Not application / Emissions are known to be zero.....	0
Emissions based on source testing.....	1
Emissions based on material balance using engineering expertise and knowledge of process.....	2
Emissions calculated using emission factors from EPA publications No. AP-42 Compilation of Air Pollution Emissions Factors.....	3
Judgment.....	4
Emissions calculated using a special emission factor different from that in AP-42.....	5
Other (Specify in comments).....	6



NON-TITLE V PERMIT APPLICATION EMISSION POINT DESCRIPTION

Please type or print and submit in duplicate for each stack or emission source. Attach to the Non-Title V Facility Identification Form (APC 100).							
GENERAL IDENTIFICATION AND DESCRIPTION							
1. Organization name New Cingular Wireless PCS, LLC dba AT&T Mobility					For APC use only	APC Company point no.	
2. Emission source no. (As on Non-Title V Facility Identification Form) GEN 1			Flow diagram point number			APC Log/Permit no.	
3. Brief emission point description (Attach a sketch if appropriate): Emergency use diesel generator designed for 50 kW; maximum engine output of 70 kW (93 hp).					Distance to nearest property line (Ft.)		
STACK AND EMISSION DATA							
4. Stack or emission point data:	Height above grade (Ft.) → 7	Diameter (Ft.) 0.25	Temperature (°F) 930	% of time over 125°F 100	Direction of exit (Up, down or horizontal) Up		
Data at exit conditions: →	Flow (actual Ft. ³ /Min.) 534	Velocity (Ft./Sec.) 181.3	Moisture (Grains/Ft. ³)		Moisture (Percent)		
Data at standard conditions: →	Flow (Dry std. Ft. ³ /Min.)	Velocity (Ft./Sec.)	Moisture (Grains/Ft. ³)		Moisture (Percent)		
5. Air contaminants	Actual emissions				Emissions est. method code	Control devices *	Control efficiency%
	Emissions (Lbs./Hr.)		Concentration	Avg. emissions (Tons/Yr.)			
	Average	Maximum					
Particulate matter	0.06	0.06	** 8.82E-04 lb/kW-hr	0.02	5 (Tier 3)	None	N/A
Sulfur dioxide (SO ₂)	0.19	0.19	*** 2.05E-03 lb/hp-hr	0.05	3	None	N/A
Carbon monoxide (CO)	0.77	0.77	PPM 1.10E-02 lb/kW-hr	0.19	5 (Tier 3)	None	N/A
Organic compounds	0.02	0.02	PPM 2.65E-04 lb/kW-hr	4.63E-03	5 (Vendor)	None	N/A
Nitrogen oxides (NO _x)	0.73	0.73	PPM 1.04E-02 lb/kW-hr	0.18	5 (Tier 3)	None	N/A
Fluorides							
Greenhouse gases (CO ₂ equivalents)	126	126	1.80 lb/kW-hr	31.48	5 (Vendor)	None	N/A
Hazardous air pollutant (specify) Single- formaldehyde	7.68E-04	7.68E-04	8.26E-06 lb/hp-hr	1.92E-04	3	None	N/A
Hazardous air pollutant (specify) Total	2.47E-03	2.47E-03	2.65E-05 lb/hp-hr	6.17E-04	3	None	N/A
Other (specify)							
Other (specify)							
Other (specify)							

(Over)

6. Check types of monitoring and recording instruments that are attached: Opacity monitor (), SO ₂ monitor (), NO _x monitor (), Other (specify in comments) ()	
7. Comments Emissions calculated based on the generator operating at full capacity for 500 hours per year, maximum engine rating, and Tier 3 emission factors for CO, NO _x , and PM. Vendor factors used for VOC and GHG. AP-42 factor from Section 3.3 used for SO ₂ .	
8. Control device or Method code description:	Description of operating parameters of device (flow rate, temperature, pressure drop, etc.): N/A

* Refer to the tables below for estimation method and control device codes.

** Exit gas particulate matter concentration units: Process – Grains/Dry Standard Ft³ (70°F), Wood fired boilers - Grains/Dry Standard Ft³ (70°F), all other boilers – Lbs. /Million BTU heat input.

*** Exit gas sulfur dioxide concentrations units: Process – PPM by volume, dry bases, and boilers – Lbs. /Million BTU heat input

Table of Pollution Reduction Device or Method Codes
(Alphabetical listing)

Note: For cyclones, settling chambers, wet scrubbers, and electrostatic precipitators; the efficiency ranges correspond to the following percentages:

High: 95-99+% Medium: 80-95% And Low: Less than 80%.

If the system has several pieces of connected control equipment, indicate the sequence. For example: 008'010.97%

If none of the below codes fit, use 999 as a code for other and specify in the comments.

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Judgment.....	4
Emissions calculated using a special emission factor different from that in AP-42.....	5
Other (Specify in comments).....	6

State of Tennessee
 Department of Environment and Conservation
 Division of Air Pollution Control
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, TN 37243
 Telephone: (615) 532-0554



APC 102

NON-TITLE V PERMIT APPLICATION PROCESS OR FUEL BURNING SOURCE DESCRIPTION

Please type or print and submit in duplicate and attach to the Non-Title V Facility Identification Form (APC 100).			
GENERAL IDENTIFICATION AND DESCRIPTION			
1. Organization name New Cingular Wireless PCS, LLC dba AT&T Mobility	For APC use only	APC Company – Point no.	
2. Emission source no. (As on Non-Title V Facility Identification Form) GEN 1		APC Log/Permit no.	
3. Description of process unit Emergency use generator, GENERAC 5564-0 (SD-050). Engine manufactured after April 1, 2006. Rated at 50 kW; maximum engine output of 70 kW. Limited to 500 operating hours per year.			
PROCESS SOURCE DESCRIPTION AND DATA			
4. Type of source		(Check only one option below)	
Process Source: Apply for a separate Permit for each source. (Check at right and complete lines 5, 6, and 11)		()	
Process Source with in process fuel: Products of combustion contact materials heated. Apply for a separate permit for each source. (Check at right and complete lines 5, 6, and 8 through 11)		()	
Non-Process fuel burning source: Products of combustion do not contact materials heated. Complete this form for each boiler or fuel burner and complete a Non-Title V Emission Point Description Form (APC 101) for each stack. (Check at right and complete lines 7 to 11)		(X)	
5. Type of operation: Continuous ()	Batch ()	Normal batch time	Normal batches/day
6. Process material inputs and In-process solid fuels	Diagram reference	Input rates (pounds/hour)	
		Design	Actual
A.			
B.			
C.			
D.			
E.			
F.			
G.			
Totals			

* A simple process flow diagram must be attached.

(Over)

BOILER, BURNER, GENERATOR, OR SIMILAR FUEL BURNING PROCESS DESCRIPTION							
7. Boiler or burner data: (Complete lines 7 to 11 using a separate form for each boiler, burner, etc.)							
Number	Stack number**	Type of firing***	Rated horsepower	Rated input capacity (10 ⁶ BTU/Hr.)	Other rating (specify capacity and units)		
GEN 1	GEN 1	Internal Combustion Engine	93 (engine)	0.57 (engine)	70 kW (engine); 50 kW (generator)		
Serial no.	Date constructed	Date manufactured	Date of last modification (explain in comments below)				
N/A	September 17, 2013	2013					
** Source with a common stack will have the same stack number. *** Cyclone, spreader (with or without reinjection), pulverized (wet or dry bottom, with or without reinjection), other stoker (specify type, hand fired, automatic, or other type (describe below in comments)).							
FUEL USED IN BOILER, BURNER, GENERATOR, OR SIMILAR FUEL BURNING SOURCE							
8. Fuel data: (Complete for a process source with in process fuel or a non-process fuel burning source)							
Primary fuel type (specify)				Standby fuel type(s) (specify)			
Ultra low sulfur diesel							
Fuels used	Annual usage	Hourly usage		% Sulfur	% Ash	BTU value of fuel	(For APC use only) SCC code
		Design	Average				
Natural gas:	10 ⁶ Cu. Ft.	Cu. Ft.	Cu. Ft.	/ / / / / / / /	/ / / /	1,000	
#2 Fuel oil:	10 ³ Gal.	Gal.	Gal.		/ /		
Primary	2.08	4.15	4.15	0.0015	/ / / /	137,000 Btu/gal	
#5 Fuel oil:	10 ³ Gal.	Gal.	Gal.		/ / / /		
#6 Fuel oil:	10 ³ Gal.	Gal.	Gal.		/ / / /		
Coal:	Tons	Lbs.	Lbs.				
Wood:	Tons	Lbs.	Lbs.	/ / / / / / / /	/ / / /		
Liquid propane:	10 ³ Gal.	Gal.	Gal.	/ / / / / / / /	/ / / /	85,000	
Other (specify type & units):							
9. If Wood is used as a fuel, specify types and estimate percent by weight of bark							
N/A							
10. If Wood is used with other fuels, specify percent by weight of wood charged to the burner.							
N/A							
11. Comments							
Source is limited to 500 operating hours per year and will operate as an emergency engine.							